

**-FILED- UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA****DEC 30 2019**At
ROBERT N. TRGOVICH, Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA[This form is for non-prisoners to file a civil complaint. NEATLY print in ink (or type) your answers.][You are the **PLAINTIFF**, print your full name on this line.]

v.

TransUnion

[The **DEFENDANT** is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Case Number

2:19CV 503[For a new case in this court, leave blank.
The court will assign a case number.][The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]**CIVIL COMPLAINT**

#	Defendant's Name and Job Title	Address
1	[Put the defendant named in the caption in this box.] TransUnion	Attn.: Custodian of Records, 555 West Adams Street, Chicago, IL 60661.
2	[Put the names of any other defendants in these boxes.] Equifax	Office of Consumer Affairs 1550 Peachtree Street North East Atlanta, Georgia 30309
3		

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and address of each defendant in a separate box as shown here.]1. How many defendants are you suing? 22. What is your address? 7420 Chestnut Ave, Hammond, IN, 463243. What is your telephone number: (708) 491-3613

4. Have you ever sued anyone for these exact same claims?

☒ No.☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

DO NOT: Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how these events happened.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

DO NOT: Include the names of minors, social security numbers, or dates of birth.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. *[The first paragraph has been numbered for you.]*

1. After reviewing my credit report on 05/14/2019 , I discovered erroneous and derogatory credit reporting of two accounts by the name of Citibank N.A. on my Equifax & Transunion credit reports. (Documents 1-4) After contacting Citibank N.A. concerning these accounts Citibank N.A. issued an update to Experian ,TransUnion, and Equifax to remove these accounts and my credit score rose immediately. (Document 5) After further requests to Citibank N. A more information on these accounts were recovered.Citibank stated " we reported loans as being Account Paid in full as a charge off". (Document 6) Citibank N. A also explained when and who the loans were sold to (Document 7) Had I not inquired about these accounts on my credit reports, Equifax, TransUnion,and Citibank N.A would still be causing injury to my character by misrepresentation due to false and inaccurate credit reporting. Equifax and TransUnion allowed these were reported for eleven years , which clearly displays their errors and damage by not removing the loans when they were sold or when seven years passed from the date of the first delinquency . Citibank N.A and I have reached a private settlement outside court as they have been held responsible for their role in this matter. (Document 8) I now seek compensation from Equifax and TransUnion as well . I have sent a Notice of Intent To Sue to their Legal Department Certified Mail twice (Document 9) to Equifax and TransUnion (Document 10) and their responses have not remedy my request nor have Equifax nor Transunion attempted to negotiate a settlement before I filed a claim in district court. See (Document 11 -12) Neither Equifax nor TransUnion has attempted to negotiate my demand

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

Claims and Facts (continued)

of \$48,000.00 USD. My Financial freedom has been impacted resulting in the denial of housing, denial of credit lending opportunities , denial of employment and higher interest rates. I have a copy of two credit reports from TransUnion that displays the Citibank N.A accounts and also when they were supposed to be removed. (See Document 13) Also I have a credit report that was done in 2018 for Employment purposes in which I was denied. (Document 14)

I request a Trial by Jury .

PRIOR LAWSUITS – Have you ever sued anyone for this exact same event?

- ☒ No.
- ☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

RELIEF – If you win this case, what do you want the court to order the defendant to do?

I seek a reasonable and fair judgement against defendants for willful noncompliance

\$1,000 for Every month for the past two years that these accounts were reported fraudulently

for Statutory damages = \$ 48,000.00 Actual Damages = \$39,737.00 (2017 AGI \$ 18,403 -

TSA agent Salary \$58,240.00) Punitive Damages= \$ 50,000.00 or 3x damage award , Permanent injunction against defendant for fraudulently reporting these accounts.

FILING FEE – Are you paying the filing fee?

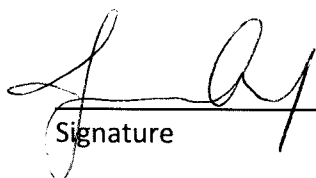
- ☐ Yes, I am paying the \$400.00 filing fee. I understand that I am responsible to notify the defendant about this case as required by Federal Rule of Civil Procedure 4. *[If you want the clerk to sign and seal a summons, you need to prepare the summons and submit it to the clerk.]*
- ☒ No, I am filing a Motion to Proceed In Forma Pauperis and asking the court to notify the defendant about this case.

[Initial Each Statement]

_____ I will keep a copy of this complaint for my records.

_____ I will promptly notify the court of any change of address.

_____ I declare **under penalty of perjury** that the statements in this complaint are true.


Signature

12/30/2019
Date